

## **EXHIBIT C**

CAUSE NO. 2019CI03804

DEBORAH BRADEN, et al.;

§ IN THE DISTRICT COURT

*Plaintiffs,*

§

v.

§ BEXAR COUNTY, TEXAS

ACADEMY, LTD. D/B/A ACADEMY  
SPORTS + OUTDOORS

§  
§  
§

*Defendant.*

§ 225TH JUDICIAL DISTRICT

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AFFIDAVIT OF [REDACTED] IN SUPPORT OF PROTECTIVE ORDER

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STATE OF TEXAS §

§

COUNTY OF HARRIS §

BEFORE ME, the undersigned Notary Public, on this day personally appeared [REDACTED]

[REDACTED] who after being by me first duly sworn upon oath, stated as follows:

1. My name is [REDACTED]. I am over twenty-one (21) years of age, have never been convicted of a felony or crime of moral turpitude, and am fully competent to provide this testimony. I have personal knowledge of all the facts stated herein, all of which are true and correct.

2. I am an Academy employee with knowledge of its non-public documents and confidential information produced in the above-styled lawsuit (the “Lawsuit”), as well as the facts related to the development and maintenance of that information, and why it is important to maintain that information confidential.

3. Plaintiffs have requested thousands of pages of non-public, proprietary, and confidential documents as part of discovery in the Lawsuit. Plaintiffs’ requests include, for example, Academy firearm training policies and procedures; Academy firearms procedure

manuals; Academy firearm license applications and renewals; Academy emails regarding policies and procedures and the strategies related thereto; Academy ATF audits; Academy human resource materials for certain employees; and Academy public communications procedures.

4. Each of these categories of documents contains non-public, proprietary, and confidential financial, business, and strategic planning information that is kept confidential by Academy in its ordinary course of business and that Academy has policies, practices, and procedures in place to maintain that confidentiality.

5. Plaintiffs have also requested the following documents, which contain non-public, proprietary, and confidential sales and customer information. In response to these requests, Academy is prepared to produce certain purchase and sales information for sales from all Bexar County stores to purchasers who present an out-of-state identification and represent that they have an out-of-state address; summaries of cost, revenue, and profit for sales to such purchasers; and Academy vendor and distributor agreements with terms specific to Academy.

6. The non-public information contained in these documents is the result of Academy's expenditure of substantial human and financial resources over many years for the purpose of researching and developing the best policies, procedures, practices, and methods for marketing and selling firearms in the safest and most efficient manner possible. Those efforts are reflected in both the policies, procedures, practices, and methods contained in the documents, as well as the communications related thereto, and the analysis and auditing thereof.

7. All of this information is maintained strictly confidential by Academy, both to protect the privacy of Academy's customers and because it has huge commercial value for Academy's competitors, as well as other market actors. If Academy's non-public, proprietary,

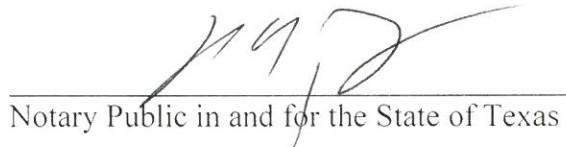
and confidential financial, business, and strategic planning information was made available to other market actors, Academy would immediately lose the value of its research and development efforts, as well as its ability to set itself apart as an industry leader on the basis of those practices.

**FURTHER AFFIANT SAYETH NAUGHT.**

Executed in Harris County, state of Texas, on the 21 of June, 2019.



SWORN TO AND SUBSCRIBED before me by [REDACTED] on June 21, 2019.

  
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Notary Public in and for the State of Texas

My commission expires: 11/18/2019

